

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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Megan Kuan, *on behalf of herself and others similarly
situated in the Proposed FLSA Collective Action,*

Index No.: 1:22-cv-01583

STIPULATION

Plaintiff,

-against-

Notoriety Group LLC, Anthony Shnayderman, Nathan
Leong, and Niv Shaked,

Defendants.
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Defendants Notoriety Group LLC, Anthony Shnayderman, Nathan Leong, and Niv Shaked (collectively, the “Defendants”), by their undersigned counsel, agree and stipulate with Plaintiff Megan Kuan (the “Plaintiff”), by their undersigned counsel, as follows:

IT IS HEREBY STIPULATED AND AGREED by and between the parties that Defendants’ time to reply or otherwise respond to Plaintiff’s Complaint is extended through and including **August 12, 2022**;

IT IS FURTHER STIPULATED AND AGREED that Defendants waive any defense to personal jurisdiction due to improper service of process;

IT IS FURTHER STIPULATED AND AGREED that Anthony Shnayderman, Nathan Leong, and Niv Shaked have accepted service of the Summons and Complaint through the undersigned counsel for the Defendants; and

IT IS FURTHER STIPULATED AND AGREED that this stipulation may be signed in counterparts and that a facsimile copy or other electronic copies shall be deemed originals.

Dated: New York, New York
August 3, 2022

LAW OFFICE OF VICTOR M. FERARU

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